

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA,**

**v.**

**DEVOS LTD. d/b/a Guaranteed  
Returns, et al.**

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**CRIMINAL ACTION**

**NO. 14-574 (PBT)**

**DECLARATION OF DONNA FALLON**

I, DONNA FALLON, declare as follows:

1. I was the Chief Financial Officer of Devos Ltd. d/b/a Guaranteed Returns (“Guaranteed Returns” or the “Company”) for a period that includes April 5, 2011 through October 29, 2014.
2. As CFO, I maintained an office at the Company’s headquarters located at 100 Colin Drive, Holbrook, New York 11741.
3. My office was walled off from the rest of the Company’s workspace. It could only be accessed through a single door, which had a lock. I did not share my office with anyone else, and other employees were not allowed to enter my office without my permission.
4. In my office, I had a desk with drawers, a credenza and a book case. I had a desktop computer that sat on my desk.
5. I kept many personal items in my office, including personal financial records, personal tax documents, and personal bills. Many of these documents were kept in a drawer of my desk.
6. The credenza in my office had locks, and I typically locked the right side of the credenza.
7. I used the computer in my office for both personal matters and for Company



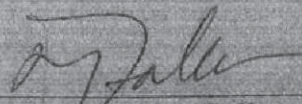
business. My computer was password protected.

8. I had only one email address—my Guaranteed Returns email address—and I used it for both personal matters and for Company business.

9. Based on the above facts, it was my expectation that the items in my office would remain under my control and would not be available to others absent my consent.

10. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Mullin St. New York  
January 11, 2016

  
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Donna Fallon



**CERTIFICATE OF SERVICE**

I, Robert J. Cleary, Esquire, hereby certify that the following documents have been filed electronically and are available for viewing and downloading from the Electronic Case Filing system: (1) the Declaration of Donna Fallon In Support Of Defendants' Pretrial Motions; (2) the Declaration of Dean Volkes In Support Of Defendants' Pretrial Motions; (3) Defendants' Motion To Seal; and (4) Defendants' Proposed Sealing Order. Notice has been sent through the ECF system to counsel of record, who have all consented to electronic service, including Assistant United States Attorneys Nancy Rue and Patrick Murray.

Dated: New York, New York  
January 13, 2016

/s/ Robert J. Cleary

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